

August 12, 2025

VIA ECF

Honorable Jeannette A. Vargas
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Graham v. UMG Recordings, Inc.*, 1:25-cv-399 (JAV)

Dear Judge Vargas:

Pursuant to Federal Rules of Civil Procedure 5.2(d), Section 10(C) of the Court's Individual Rules and Practices in Civil Cases, and the stipulated Protective Order (ECF No. 49) in the above-captioned action, Plaintiff Aubrey Drake Graham ("Plaintiff") files this letter motion seeking an order permitting Plaintiff to file under seal a contract between UMG and Kendrick Lamar Duckworth as produced by UMG with the designation Attorney's Eyes Only ("Lamar Contract"). Plaintiff intends to file the Lamar Contract as an exhibit to a motion to compel UMG to, among other things, produce the Lamar Contract without redactions.¹

Plaintiff requests an order granting Plaintiff permission to file the Lamar Contract under seal on the basis that UMG requested it.

We thank the Court for its attention to this matter.

Respectfully submitted,

Willkie Farr & Gallagher LLP

/s/ Michael J. Gottlieb

Counsel for Plaintiff

cc: All counsel of record via ECF

¹ The Lamar Contract has been provided to the Court as produced by UMG to Plaintiff.